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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

15 META PLATFORMS, INC., a Delaware
16 corporation,

17 Plaintiff,

18 v.

19 BRIGHT DATA LTD., an Israeli corporation,

20 Defendant.

Case No. 3:23-cv-00077-EMC

JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
BRIEFING SCHEDULE FOR EARLY
DISPOSITIVE MOTIONS - AS
MODIFIED BY THE COURT.

Hon. Edward M. Chen
Courtroom 5 - 17th Floor

Pursuant to Civil L.R. 6-1 and 7-12, Plaintiff Meta Platforms, Inc. (“Meta”) and Defendant Bright Data Ltd. (“Bright Data”) submit this stipulation regarding a briefing schedule for the parties’ early dispositive motions.

WHEREAS, on May 31, 2023, the parties filed a Disputed Joint Statement Regarding the Form, Timing, and Length of Early Dispositive Motions. Dkt. No. 72.

WHEREAS, on June 8, 2023, the Court ordered the parties to raise any early dispositive motions through summary judgment briefing. The Court directed that there “shall be a total of four briefs; Bright Data shall file its motion first.” Dkt. 74. With respect to the page limits, the Court held that the “opening brief and the opposition/cross-motion shall each be no longer than 30 pages [and] the reply and sur-reply shall each be no longer than 20 pages.” The Court also ordered the parties to file a stipulation with a briefing schedule. *Id.*

IT IS HEREBY STIPULATED AND AGREED by and between the parties:

- Bright Data’s Motion for Summary Judgment was filed June 12, 2023, and is authorized to be no more than 30 pages. *See* Dkt. 75.
- Meta shall file a combined Opposition to Bright Data’s Motion for Summary Judgment and Cross-Motion for Summary Judgment, if any, of no more than 30 pages by July 12, 2023.
- Bright Data shall file a combined Reply in Support of its Motion for Summary Judgment and Opposition to any Cross-Motion of no more than 20 pages by August 11, 2023.
- Meta shall file a Reply in Support of any Cross-Motion of no more than 20 pages by September 11, 2023.
- The filing of a summary judgment motion by either party pursuant to this stipulation and the Court’s Order on early dispositive motions (Dkt. 74) is without prejudice to the filing of a second summary judgment motion at a later time, including following the close of discovery.

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Although the parties stipulated that their early summary judgment motions would be without prejudice to the filing of a second summary judgment motion, the Court shall require a party that files an early summary judgment motion to seek permission to file a second summary judgment motion.

DATED: June 15, 2023

Respectfully submitted,

WILMER CUTLER PICKERING
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/s/ Ari Holtzblatt

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1 DATED: June 15, 2023

Respectfully submitted,

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CERTIFICATION

I, Ari Holtzblatt, am the ECF User whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER REGARDING MOTION TO DISMISS BRIEFING SCHEDULE. In compliance with Civil L.R. 5-1(h)(3), I hereby attest that each other signatory has concurred in this filing.

Dated: June 15, 2023


/s/ Ari Holtzblatt

Ari Holtzblatt

~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, IT IS SO ORDERED.

Dated: 6/21/2023



The Honorable Edward M. Chen
Senior United States District Judge